

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: GENERATOR TECHNOLOGIES, LLC **CHAPTER 11**
Debtor **CASE NO. 22-00833-JAW**

**FIRST APPLICATION FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF NECESSARY EXPENSES DURING THE ADMINISTRATIVE
PHASE OF THE CASE FOR THE LAW OFFICES OF CRAIG M. GENO, PLLC**

COMES NOW the Law Offices of Craig M. Geno, PLLC (the “Applicant”), and files this its *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses During the Administrative Phase of the Case* (the “Application”), and in support thereof would show unto the Court the following, to-wit:

1. On April 29, 2022, the Debtor herein filed with this Court its original Petition for reorganization under Chapter 11 of the Bankruptcy Code.
2. An Order [DK #88] authorizing the employment of the Law Offices of Craig M. Geno, PLLC as counsel for the Debtor was entered on June 6, 2022.
3. The substantial services rendered to the Debtor and the expenses incurred by Applicant benefitted the estate. An Affidavit reflecting said legal services rendered and expenses incurred is attached hereto as **Exhibit “A”**. The Affidavit also certifies and represents to the Court that the services rendered to the Debtor were reasonable and necessary and that said services have actually been rendered. A detailed itemization of such services and expenses is attached as **Exhibit “B”** and incorporated by reference.
4. The fees and expenses charged and incurred represent reasonable and necessary fees and expenses that were required to be extended by Applicant to the Debtor in all matters which are anticipated to arise in the functioning of litigation matters, case administration and to protect and preserve all rights of the Debtor and the interests of creditors in furtherance of the counsel’s

obligations herein; and they represent normal and customary fees and expenses incurred and charged for representation of debtors in similar cases. The time, skill and experience utilized by counsel for the Debtor justify the approval of the Application.

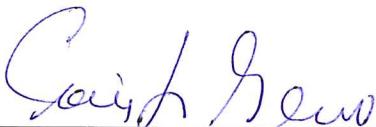
5. This is the Applicant's first request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from April 25, 2022, to and including July 29, 2022, and is for the sum of \$36,717.88 (\$33,970.00 in fees and \$2,747.88 in expenses), less any retainer balance remaining.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys' fees for the professional services rendered herein, and authorizing and directing the Debtor to pay said attorneys' fees and expenses. Applicant prays for general relief.

THIS, the 1st day of August, 2022.

Respectfully submitted,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
LAW OFFICES OF CRAIG M. GENO, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com

N:\Firm Data\Users\Bankrupt\Generator Technologies, LLC\Fee Apps\CMG\1st\Application.wpd

CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to the following:

Christopher J. Steiskal, Esq.
christopher.j.steiskal@usdoj.gov

Kimberly D. Strong
Subchapter V Trustee
kstrong@hrkcpa.com

THIS, the 1st day of August, 2022.



Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: GENERATOR TECHNOLOGIES, LLC **CHAPTER 11**
Debtor **CASE NO. 22-00833-JAW**

EXHIBIT “A”

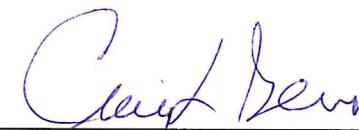
IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: **GENERATOR TECHNOLOGIES, LLC**
Debtor

CHAPTER 11
CASE NO. 22-00833-JAW

AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno, one of the attorneys for the Debtor, who after having been first by me duly sworn, stated on oath that this Affidavit is submitted in support of the *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses During the Administrative Phase of the Case for the Law Offices of Craig M. Geno, PLLC* (the “Application”), Debtor’s counsel, that the statements which are attached to the Application as Exhibit “B” represent a detailed statement of reasonable fees and expenses. Affiant hereby makes application for payment of reasonable attorney's fees and necessary expenses.

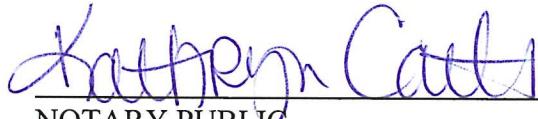


Craig M. Geno

STATE OF MISSISSIPPI
COUNTY OF MADISON

SWORN TO AND SUBSCRIBED BEFORE ME, this the 1st day of August, 2022.





NOTARY PUBLIC

MY COMMISSION EXPIRES June 21, 2025

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: GENERATOR TECHNOLOGIES, LLC **CHAPTER 11**
Debtor **CASE NO. 22-00833-JAW**

EXHIBIT “B”

Law Offices of Craig M. Geno, PLLC
587 Highland Colony Parkway
Ridgeland, MS-Mississippi 39157 USA

Ph:601-427-0048 Fax:601-427-0050

Generator Technologies, LLC
2187 Highway 51
Suite B
Madison, MS-Mississippi
39110 USA

July 29, 2022

File #: 322007
Attention: Les & Cheryl Battles Inv #: 347671

RE: Chapter 11 - SubV

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Apr-25-22	Review and revision of draft Petition	0.25	100.00	CMG
	Assist CMG setting up file, drafting Petition, New Client Data Sheet	0.50	100.00	KLC
Apr-29-22	Telephone conference with Les Battles re timing of filing	0.10	40.00	CMG
	Review case administrator assignment	0.10	40.00	CMG
	Review notice of deficiency re creditor matrix, list of 20 largest unsecured creditors, corporate ownership statement	0.15	60.00	CMG
	Review notice of deficiency re small business documents	0.20	80.00	CMG
	Review notice of deficiency for schedules and statement of financial affairs	0.20	80.00	CMG
	Review memo from Keisha Moore re reminder of need to file application to employ	0.10	40.00	CMG
	Review order re tax account	0.20	80.00	CMG
	Receipt and review of Order re taxes; calendar deadline to open tax account and notify UST	0.10	20.00	KLC

Invoice #: 347671

Page 2

July 29, 2022

	Receipt and review of Deficiency Notice; calendar deadline to file Equity Security Holders, Schedules, SOFA, Attorney Disclosure Statement	0.10	20.00	KLC
	Receipt and review of Deficiency Notice; calendar deadline to file small business documents	0.10	20.00	KLC
	Receipt and review of Deficiency Notice; calendar deadline to file Matrix, Corporate Ownership Statement, 20 Largest Unsecured Creditors	0.10	20.00	KLC
	Assist CMG revising Petition	0.10	20.00	KLC
	Assist CMG drafting Matrix	1.80	360.00	KLC
May-01-22	Review memos to/from John Majewski, representative of Entergy, re maintenance of ordinary course of business payments in lieu of bond	0.25	100.00	CMG
May-02-22	Review memos to/from KLC; Review matrix and 20 largest unsecured creditors and comment on same	0.35	140.00	CMG
	Review memos to/from KLC re stopping payments on trucks	0.20	80.00	CMG
	Assist CMG revising Matrix	0.25	50.00	KLC
	Assist CMG drafting and revising List of 20 Largest Unsecured Creditors, Corporate Ownership Statement, Schedules D, E/F	0.60	120.00	KLC
May-03-22	Review appointment of Chapter 11 trustee	0.20	80.00	CMG
	Review status conference notice	0.20	80.00	CMG
	Review memos to/from Chris Steiskal, Kim Strong re scheduling 341	0.20	80.00	CMG
	Receipt and review of Notice of 1188(a) Status Conference; calendar deadline to submit status report and hearing date to trigger preparation of hearing folder	0.15	30.00	KLC
May-04-22	Review notice of meeting of creditors	0.20	80.00	CMG

Invoice #: 347671

Page 3

July 29, 2022

	Receipt and review of Notice of Meeting of Creditors; calendar various deadlines and hearing date to trigger preparation of hearing folder	0.15	30.00	KLC
May-05-22	Review UnitedHealthcare proof of claim	0.20	80.00	CMG
May-06-22	Review Ally notice	0.20	80.00	CMG
	Review accounting documents and related matters; Review and revision of balance sheet disclosures	0.55	220.00	CMG
	Review income tax return for tax year 2020	1.00	400.00	CMG
	Review UnitedHealthcare claim and updated claim	0.25	100.00	CMG
	Review notice from Community Bank	0.15	60.00	CMG
May-09-22	Review and revision of Rule 2016(b) statement	0.15	60.00	CMG
	Dictation of application to employ	0.45	180.00	CMG
	Dictation of notice re application to employ	0.15	60.00	CMG
	Dictation of certificate of service re application to employ	0.15	60.00	CMG
	Dictation of order on application to employ; Review and revision of same; Review and revision of application to employ	0.45	180.00	CMG
	Review filed order re scheduling and status	0.10	40.00	CMG
	Review notice/required action re filing application to employ	0.10	40.00	CMG
	Review proof of claim of AmeriCredit Financial Services	0.35	140.00	CMG
	Assist CMG drafting Attorney Disclosure Statement, Application to Employ CMG, Notice, Certificate of Service and Order re same	0.40	80.00	KLC
	Organize and supervise mailout of Application to Employ CMG	0.50	100.00	KLC

Invoice #: 347671

Page 4

July 29, 2022

May-10-22	Review extensive memos to/from client, Intuit, customer re protest and dispute of charges, results	1.00	400.00	CMG
	Telephone conference with customer re violation of the automatic stay	0.25	100.00	CMG
May-11-22	Telephone conference with John Bullard (vm) re motion for sanctions	0.10	40.00	CMG
	Dictation of motion for sanctions	1.25	500.00	CMG
	Review and revision of motion for sanctions	0.35	140.00	CMG
	Dictation of motion and order to expedite hearing on motion for sanctions; Review and revision of same	0.40	160.00	CMG
	Telephone conference with Noble Lee re claims to assert for failure to deliver generator	0.10	40.00	CMG
	Review notice from Laura Courtney	0.15	60.00	CMG
	Review memos to/from Candice Ramage re submission of order on expedited hearing request and proposed hearing dates	0.20	80.00	CMG
	Review proof of claim of Maurice James	0.25	100.00	CMG
	Telephone conference with John Bullard (counsel to Ellen Foster) re claims for stay violation	0.20	80.00	CMG
	Review memos to/from client re bank actions on stay violations	0.20	80.00	CMG
	Review additional memos to/from Candice Ramage re hearing date/time re stay motion	0.20	80.00	CMG
	Assist CMG drafting and revising Motion to Enforce Stay Against Ellen Foster, Motion to Expedite Hearing and Order re same	0.80	160.00	KLC
May-12-22	Review memos to/from Cheryl Battles re bank reversing payment on Ellen Foster claim	0.25	100.00	CMG
	Dictation of certificate of service on Ellen Foster motion	0.15	60.00	CMG

Invoice #: 347671

Page 5

July 29, 2022

	Review memos to/from Cheryl Battles re former sales manager automobile accident and leaving without notice	0.20	80.00	CMG
	Review docket entry and docket updates re motion for sanctions and motion to expedite hearing re same	0.10	40.00	CMG
	Review notice of hearing on sanctions motion	0.20	80.00	CMG
	Review MDOR proofs of claim	0.25	100.00	CMG
	Receipt and review of Order on Motion to Expedite Hearing on Motion to Enforce Stay; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	30.00	KLC
	Assist CMG drafting Resolution	0.10	20.00	KLC
	Assist CMG drafting Certificate of Service re Motion to Enforce Stay Against Ellen Foster	0.10	20.00	KLC
	Organize and supervise mailout of Motion to Enforce Stay Against Ellen Foster	0.70	140.00	KLC
May-13-22	Review memos to/from client re Generac letters submitted to client base and related outlines	0.55	220.00	CMG
	Review memos to/from Mrs. Battles re extension of time to complete schedules	0.20	80.00	CMG
	Dictation of motion, order; Review and revision of same re extension of time to file schedules	0.45	180.00	CMG
	Assist CMG drafting Motion to Enforce Stay Against Doug Rogers	0.20	40.00	KLC
	Assist CMG drafting Motion for Additional Time to File Schedules, etc. and Order re same	0.15	30.00	KLC
May-16-22	Review proof of claim from Harold Shannon	0.25	100.00	CMG
	Review proof of claim from Tom Gerity	0.25	100.00	CMG
	Review of amended and updated claim from Tom Gerity	0.25	100.00	CMG

Invoice #: 347671

Page 6

July 29, 2022

	Review proof of claim from Ken and Donna Melichar	0.25	100.00	CMG
	Review proof of claim from Henrietta Miller	0.25	100.00	CMG
	Review memos to/from Blake Teller re claim of Beau Chaney and confirmation of intent to honor same	0.20	80.00	CMG
	Review further memos to/from Blake Teller re Beau Chaney and his claim, fulfilling Chaney contract	0.20	80.00	CMG
	Assist CMG revising Motion to Enforce Stay Against Doug Rogers	0.10	20.00	KLC
	Receipt and review of Order on Motion for Additional Time to File Required Documents; calendar deadline to file Schedules, SOFA, List of Equity Security Holders	0.10	20.00	KLC
	Assist CMG drafting Motion to Enforce Stay Against Intuit Inc.	0.55	110.00	KLC
May-17-22	Review IRS proof of claim	0.35	140.00	CMG
	Dictation of various motions/orders to expedite; Review and revision of same; Dictation of certificate of service	0.75	300.00	CMG
	Telephone conferences with Candice Ramage re scheduling issues	0.25	100.00	CMG
	Review proof of claim of Crosby Tanner	0.25	100.00	CMG
	Assist CMG drafting and revising Motions to Expedite Hearing and Orders re Motions to Enforce Stay Against Doug Rogers and Intuit Inc.	0.20	40.00	KLC
	Assist CMG drafting Certificate of Service re Motion to Enforce Stay Against Intuit Inc.	0.10	20.00	KLC
	Assist CMG drafting Certificate of Service re Motion to Enforce Stay Against Doug Rogers	0.10	20.00	KLC
	Organize and supervise mailout of Motion to Enforce Stay Against Intuit Inc. and Motion to Enforce Stay Against Doug Rogers	1.10	220.00	KLC

Invoice #: 347671

Page 7

July 29, 2022

May-18-22	Review memo from Cheryl Battles re "freezing" and suspension of Generac contracts and banking/finance information	0.20	80.00	CMG
	Dictation of letter to Generac re stay violation, assumption of executory contract and request for cooperation	0.25	100.00	CMG
	Dictation of resolution authorizing case; Review and revision of same; Review memo from KLC to client re resolution to be executed	0.25	100.00	CMG
	Receipt and review of Order on Motion to Expedite Hearing on Motion to Enforce Stay Against Doug Rogers; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	30.00	KLC
	Receipt and review of Order on Motion to Expedite Hearing on Motion to Enforce Stay Against Intuit; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	30.00	KLC
	Receipt and review of Order Resetting Hearing on Motion to Enforce Stay Against Ellen Foster; calendar hearing date to trigger preparation of hearing folder	0.10	20.00	KLC
	Assist CMG drafting letter to Generac re automatic stay	0.20	40.00	KLC
	Assist CMG drafting Supplemental Certificate of Service re Motion to Enforce Stay Against Intuit Inc.	0.15	30.00	KLC
	Assist CMG drafting Supplemental Certificate of Service re Motion to Enforce Stay Against Doug Rogers	0.15	30.00	KLC
May-19-22	Review numerous, extensive memos to/from client, Applied Bank, Synchrony Bank, Generac re numerous automatic stay violations, threats and claims of breach of numerous contracts between the Debtor and all of those entities	1.50	600.00	CMG
	Assist CMG drafting IDI documents	0.10	20.00	KLC
May-20-22	Review numerous memos to/from client, bank,	0.75	300.00	CMG

Invoice #: 347671

Page 8

July 29, 2022

Generac and related entities concerning operations, bank account information and automatic stay violations				
	Review and revision of initial debtor interview documents as submitted by client, conference with KLC re same	0.85	340.00	CMG
	Review notice from Americredit Financial Services	0.10	40.00	CMG
	Assist CMG reviewing and preparing IDI documents for production to UST	0.45	90.00	KLC
May-23-22	Review proof of claim of Ernest Pilgrim	0.25	100.00	CMG
	Review proof of claim of Robert Pope	0.25	100.00	CMG
	Attended IDI	0.75	300.00	CMG
	Review memos to/from Generac re status of executory contracts, financing of balance of purchase price and related issues	0.25	100.00	CMG
	Assist CMG performing UCC search	0.30	60.00	KLC
May-24-22	Review proof of claim submitted by Community Bank	0.35	140.00	CMG
	Dictation of motion for sanctions against Jim Fitchie; Review and revision of same; Dictation of motion and order to expedite hearing on Fitchie	0.75	300.00	CMG
	Review memos to/from Cheryl Battles re lack of generators from Generac	0.25	100.00	CMG
	Review proof of claim from Fritz Katzenmeyer	0.25	100.00	CMG
	Assist CMG drafting Motion to Enforce Stay Against Jim Fitchie, Certificate of Service re same, Motion to Expedite Hearing and Order re same	0.20	40.00	KLC
	Organize and supervise mailout of Motion to Enforce Stay Against Jim Fitchie	0.15	30.00	KLC
	Assist CMG drafting and revising	0.60	120.00	KLC

Invoice #: 347671

Page 9

July 29, 2022

Schedules A/B, D, E/F, G, H, List of Equity Security Holders

May-25-22	Review proof of claim of Wells Fargo	0.30	120.00	CMG
	Review file re Generac call to confirm credit hold	0.15	60.00	CMG
	Review POC from Clarence Evans	0.25	100.00	CMG
	Review POC of Jim Fitchie	0.25	100.00	CMG
	Review notices from Walter Newman, MDOR	0.20	80.00	CMG
May-26-22	Telephone conferences with Blake Teller, review his exhibits for hearing re claims of Ellen Foster	0.25	100.00	CMG
	Telephone conference with Cheryl Battles re hearing issues and pretrial preparation	0.20	80.00	CMG
	Review proof of claim of Billy Horne	0.20	80.00	CMG
	Review memos to/from Randall Eubanks re post-petition debt	0.20	80.00	CMG
	Review memos to/from Bradley Alexander, client re IDI deficiencies and cure	0.20	80.00	CMG
	Review file and court docket re: 5/27/22 hearing on Motion to Enforce Stay Against Ellen Foster; prepare hearing folder for same	0.25	50.00	KLC
	Assist CMG preparing exhibits for 5/27/22 hearings	0.15	30.00	KLC
May-27-22	Review proof of claim of MDOR	0.25	100.00	CMG
	Conference with client re final preparation for hearings	0.65	260.00	CMG
	Telephone conference with Blake Teller re abatement of hearing	0.20	80.00	CMG
	Attended hearing on motion for sanctions; Follow up conference with client	1.50	600.00	CMG
	Review reset order re motion for sanctions	0.20	80.00	CMG

Invoice #: 347671

Page 10

July 29, 2022

	Review Roland Brown POC	0.25	100.00	CMG
	Review Barlow POC	0.25	100.00	CMG
	Receipt and review of Order Resetting Hearing re Motion to Enforce Stay Against Intuit Inc.; calendar hearing date to trigger preparation of hearing folder	0.10	20.00	KLC
	Receipt and review of Order Resetting Hearing re Motion to Enforce Stay Against Ellen Foster; calendar hearing date to trigger preparation of hearing folder	0.10	20.00	KLC
	Assist CMG drafting and revising Schedules, SOFA, List of Equity Security Holders, draft email to Cheryl Battle re same	0.65	130.00	KLC
May-31-22	Review Bruce Milam proof of claim	0.25	100.00	CMG
	Review Randy Boudreaux proof of claim	0.25	100.00	CMG
	Review proof of claim of Kerwin Brandon	0.25	100.00	CMG
	Review proof of claim of Stan and Martha Lawson	0.25	100.00	CMG
	Review and revision of statement of financial affairs	0.45	180.00	CMG
	Review memos to/from Cheryl Battles re her inability to get documents filed on time	0.20	80.00	CMG
	Review memos to/from Chris Steiskal re adjournment and postponement of creditors' meeting	0.20	80.00	CMG
	Dictation of motion/order for additional time to file schedules; Review and revision of same	0.40	160.00	CMG
	Review proof of claim of Linda Cooksey	0.25	100.00	CMG
	Review proof of claim of Elnora Patton	0.25	100.00	CMG
	Review Ally POC	0.35	140.00	CMG
	Assist CMG drafting and revising Schedules, SOFA	0.55	110.00	KLC

Invoice #: 347671

Page 11

July 29, 2022

	Assist CMG drafting and revising 2nd Motion to Extend Time to File Schedules and Order re same	0.20	40.00	KLC
Jun-01-22	Attended 341	1.45	580.00	CMG
	Review memos to/from Cheryl Battles re bank account, Chase claim, 341 results and conversion to Chapter 7	0.25	100.00	CMG
	Review statement adjourning 341 meeting	0.20	80.00	CMG
	Review orders; Draft additional pleadings and certificates of service re stay violations; Conference with KLC re same	0.45	180.00	CMG
	Review Sam Courtney proof of claim	0.25	100.00	CMG
	Review Ally Capital request	0.15	60.00	CMG
	Review proof of claim of Cecille Roberts	0.25	100.00	CMG
	Assist CMG revising Schedules	0.50	100.00	KLC
	Assist CMG revising Order on Motion to Expedite Hearing on Motion to Enforce Stay Against Jim Fitchie	0.10	20.00	KLC
	Assist CMG drafting Certificate of Service re Motion to Enforce Stay Against Jim Fitchie	0.10	20.00	KLC
	Organize and supervise mailout of Motion to Enforce Stay Against Jim Fitchie	0.50	100.00	KLC
Jun-02-22	Review memos to/from Barbara Blackmon re status of her order, inability to peg a date certain for fulfilling	0.25	100.00	CMG
	Receipt and review of Order on 2nd Motion to Extend Time to File Required Documents; calendar deadline to file Schedules	0.10	20.00	KLC
	Receipt and review of Minutes from continued Meeting of Creditors; calendar deadline to cure deficiencies and continued hearing date to trigger preparation of hearing folder	0.15	30.00	KLC
	Receipt and review of Order on Motion to Expedite Hearing re Motion to Enforce Stay	0.15	30.00	KLC

Invoice #: 347671

Page 12

July 29, 2022

Against Jim Fitchie; calendar hearing date and objection deadline to trigger preparation of hearing folder				
	Assist CMG drafting Supplemental Certificate of Service re Order Resetting Hearing on Motion to Enforce Stay Against Intuit Inc.	0.20	40.00	KLC
	Assist CMG drafting Motion to Enforce Stay Against Richard Palmer, Motion to Expedite Hearing and Order re same	0.20	40.00	KLC
	Organize and supervise mailout of Order Resetting Hearing on Motion to Enforce Stay Against Intuit Inc.	0.25	50.00	KLC
	Assist CMG revising Schedules and drafting email to Cheryl Battles re same	1.00	200.00	KLC
Jun-03-22	Dictation of status report	0.85	340.00	CMG
	Review and revision of status report	0.25	100.00	CMG
	Review proof of claim of Shirley Monroe	0.25	100.00	CMG
	Review proof of claim of Billy Horne	0.25	100.00	CMG
	Review memos to/from Cheryl Battles re schedules, next hearing dates and related matters	0.20	80.00	CMG
	Assist CMG revising Motion to Enforce Stay Against Richard Palmer	0.10	20.00	KLC
	Organize and supervise mailout of Motion to Enforce Stay Against Richard Palmer	0.15	30.00	KLC
	Assist CMG drafting 1188(c) Status Report and Certificate of Service re same	0.35	70.00	KLC
Jun-06-22	Review memos to/from Cheryl Battles re schedules, Palmer chargeback	0.25	100.00	CMG
	Review POC of Roosevelt Joiner	0.25	100.00	CMG
	Conference with KLC re confusing inventory itemizations, descriptions and values	0.20	80.00	CMG
	Review and revision of schedules	1.00	400.00	CMG

Invoice #: 347671

Page 13

July 29, 2022

	Final review and revision of status report	0.50	200.00	CMG
	Receipt and review of Order re Motion to Expedite Hearing on Motion to Enforce Stay Against Richard Palmer; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	30.00	KLC
	Assist CMG revising 1188(c) Status Report	0.10	20.00	KLC
	Organize and supervise mailout of 1188(c) Status Report	1.35	270.00	KLC
	Assist CMG drafting Certificate of Service re Motion to Enforce Stay Against Richard Palmer	0.15	30.00	KLC
	Organize and supervise mailout of Motion to Enforce Stay Against Richard Palmer	0.20	40.00	KLC
	Assist CMG drafting and revising Schedules	0.75	150.00	KLC
Jun-07-22	Review memos to/from Cheryl Battles re Generac stay issues	0.25	100.00	CMG
	Review memos to/from client, Generac re performance of dealer/distribution agreement	0.20	80.00	CMG
Jun-08-22	Review Larry Reedy POC	0.25	100.00	CMG
	Review memos to/from Slice merchant re account at issue and account closing/chargeback	0.25	100.00	CMG
	Review notice from Myles Cross	0.20	80.00	CMG
	Review Myles Cross POC	0.25	100.00	CMG
Jun-09-22	Review POC of Ben Nelson Golf	0.25	100.00	CMG
	Review Alice Jackson POC	0.25	100.00	CMG
	Telephone conference with Jeff Barber re case background, status and related issues	0.45	180.00	CMG
	Review Ally POC	0.65	260.00	CMG

Invoice #: 347671

Page 14

July 29, 2022

Jun-10-22	Review memos from Larry Reedy re place in line, workout through escrow	0.25	100.00	CMG
Jun-13-22	Review proof of claim of Clark Bobst	0.25	100.00	CMG
	Receipt and review of Notice of Deficiency re Amended Schedules; calendar deadline to file Amended Matrix	0.10	20.00	KLC
Jun-14-22	Telephone conference with Jeff Leber re his contract and assumption	0.20	80.00	CMG
	Review memos to/from Cheryl Battles re update with Costco shipments and agreements, open Synchrony accounts, adding customers to the matrix and additional requests for Slice information	0.25	100.00	CMG
	Review proof of claim of Guzel Dempsey	0.25	100.00	CMG
	Review proof of claim of Jo Lynn Williams	0.25	100.00	CMG
	Review proof of claim of Jesse Lidge	0.25	100.00	CMG
	Review memos to/from Jeff Barber re Generac response to compliance with distributorship agreement, client response to Generac request for documents; Review update on client response to document generation and Generac requests	0.30	120.00	CMG
	Review memos to/from Cheryl Battles; Review Synchrony financed order list	0.35	140.00	CMG
	Review memo from Cheryl Battles and review Costco correspondence and efforts to continue Costco business	0.25	100.00	CMG
Jun-15-22	Review memos to/from Candice Ramage re order on Doug Rogers	0.20	80.00	CMG
	Attended meeting of creditors	2.50	1,000.00	CMG
	Review meeting of creditors minutes and memo from Office of UST	0.20	80.00	CMG
Jun-16-22	Review memos to/from client re general rejections of unprofitable sales contracts, claims against defaming creditor	0.25	100.00	CMG

Invoice #: 347671

Page 15

July 29, 2022

	Review proof of claim of Bill Richardson	0.25	100.00	CMG
	Receipt and review of Minutes from Meeting of Creditors; calendar deadline to cure deficiencies	0.10	20.00	KLC
Jun-17-22	Review POC from Myra & Steve Norville	0.20	80.00	CMG
	Assist CMG drafting Amended Schedule G and Amended Matrix	0.30	60.00	KLC
Jun-20-22	Review numerous memos to/from Cheryl Battles re documents for production at hearings	0.25	100.00	CMG
	Telephone conference with Blake Teller re withdrawal of claim against Ellen Foster	0.15	60.00	CMG
	Conference with KLC to prepare exhibits and hearing folders	0.25	100.00	CMG
	Review file and court docket re: 6/21/22 hearing on Motion to Enforce Stay Against Intuit Inc.; prepare hearing folder and exhibits for same	0.50	100.00	KLC
	Review file and court docket re: 6/21/22 hearing on Motion to Enforce Stay Against Jim Fitchie; prepare hearing folder and exhibits for same	0.35	70.00	KLC
	Review file and court docket re: 6/21/22 hearing on Motion to Enforce Stay Against Richard Palmer; prepare hearing folder and exhibits for same	0.35	70.00	KLC
	Assist CMG drafting Notice of Amendment to Schedule G, Notice to Added Creditors and revise Amended Matrix	0.80	160.00	KLC
Jun-21-22	Conference with clients re hearing testimony	0.55	220.00	CMG
	Legal research re automatic stay violations	0.75	300.00	CMG
	Attended hearings on stay violations	2.85	1,140.00	CMG
	Organize and supervise mailout of Notice to Added Creditors and Notice of Amendment to Schedule G	0.50	100.00	KLC

Invoice #: 347671

Page 16

July 29, 2022

Jun-22-22	Receipt and review of Order Resetting Hearing re Motion to Enforce Stay Against Inituit Inc.; calendar hearing date to trigger preparation of hearing folder	0.10	20.00	KLC
	Receipt and review of Order Resetting Hearing re Motion to Enforce Stay Against Doug Rogers; calendar hearing date to trigger preparation of hearing folder	0.10	20.00	KLC
Jun-23-22	Assist CMG drafting Notice of Change of Address for Mary Fehr	0.10	20.00	KLC
Jun-28-22	Review memos to/from Blake Teller re dismissal of claim against Ellen Foster	0.20	80.00	CMG
	Dictation of order withdrawing motion for sanctions against Ellen Foster	0.25	100.00	CMG
Jul-01-22	Assist CMG drafting Order Withdrawing Motion to Enforce Stay Against Ellen Foster	0.15	30.00	KLC
Jul-07-22	Review memos to/from Ms. Battles re sale of forklift	0.25	100.00	CMG
	Dictation of motion and order to sell forklift	1.00	400.00	CMG
	Review and revision of motion and order to sell forklift	0.20	80.00	CMG
	Dictation of motion and order to expedite hearing on sale of forklift	0.40	160.00	CMG
	Review and revision of motion to expedite hearing on motion to sell forklift	0.20	80.00	CMG
	Conference KLC re hearing dates on motion to sell forklift	0.15	60.00	CMG
	Dictation of certificate of service re sale motion	0.25	100.00	CMG
	Review memos to/from Ms. Battles re incorrect IRS submission	0.20	80.00	CMG
	Review memos to/from Jim Spencer re execution of modification of deed of trust and motion to compel	0.20	80.00	CMG
	Assist CMG drafting and revising Motion to Sell Forklift, Certificate of Service and	1.00	200.00	KLC

Invoice #: 347671

Page 17

July 29, 2022

Order re same, Motion to Expedite Hearing
and Order re same

Jul-08-22	Receipt and review of Order on Motion to Expedite Hearing re Motion to Sell Forklift; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	30.00	KLC
	Assist CMG drafting Certificate of Service re Motion to Sell Forklift	0.10	20.00	KLC
	Organize and supervise mailout of Motion to Sell Forklift	0.40	80.00	KLC
Jul-10-22	Review memos to/from Frank White re Intuit response	0.25	100.00	CMG
	Review memos to/from Andrew Wilson; Review draft Blue Cross Blue Shield agreed order	0.65	260.00	CMG
Jul-11-22	Telephone conference with Frank White re case status, funding and possible settlement	0.25	100.00	CMG
	Review memos to/from Frank White re settlement and documentation of it	0.20	80.00	CMG
	Review and revision of motion to sell assets; Review updated information on one truck that may be underwater	0.35	140.00	CMG
	Assist CMG drafting Motion to Sell Trucks	0.30	60.00	KLC
Jul-12-22	Assist CMG drafting Certificate of Service and Order re Motion to Sell Trucks, Motion to Expedite Hearing and Order re same	0.15	30.00	KLC
	Assist CMG drafting Agreed Order on Motion to Sell Forklift	0.15	30.00	KLC
Jul-13-22	Review Inituit agreement, memos to/from Frank White re payment medium	0.25	100.00	CMG
	Review order on motion to expedite hearing on motion to sell trucks	0.20	80.00	CMG
	Receipt and review of Order on Motion to Expedite Hearing re Motion to Sell Trucks; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	30.00	KLC

Invoice #: 347671

Page 18

July 29, 2022

	Receipt and review of Order Resetting Hearing re Motion to Enforce Stay Against Doug Rogers; calendar hearing date to trigger preparation of hearing folder	0.10	20.00	KLC
	Receipt and review of Order Resetting Hearing re Motion to Enforce Stay Against Intuit Inc.; calendar hearing date to trigger preparation of hearing folder	0.10	20.00	KLC
	Assist CMG drafting Agreed Order on Motion to Sell Trucks	0.15	30.00	KLC
	Assist CMG drafting Certificate of Service re Motion to Sell Trucks	0.10	20.00	KLC
Jul-14-22	Review memos to/from Frank White; Review Intuit settlement agreement; Dictation of memo to client re settlement agreement and instructions as to execution of it	0.75	300.00	CMG
	Organize and supervise mailout of Motion to Sell Trucks	0.70	140.00	KLC
Jul-18-22	Review order on motion to expedite hearing on sale of vehicles	0.20	80.00	CMG
	Review memos to/from Frank White re additional information from Intuit, continued demands by Intuit	0.20	80.00	CMG
	Review memos to/from Candice Ramage, Cheryl Battles re cancelled hearing	0.25	100.00	CMG
	Conference with client re new litigation and claims, execution of settlement agreement and review Intuit comments on same	0.20	80.00	CMG
	Review memos to/from client re adding trailers to sale efforts	0.20	80.00	CMG
	Review memos to/from landlord re updates on inspection and possible listing of property for sale	0.20	80.00	CMG
	Review and revision of sale order on vehicles; Review memos to/from Chris Steiskal approving agreed order on motion to sell certificated vehicles	0.20	80.00	CMG

Invoice #: 347671

Page 19

July 29, 2022

Jul-19-22	Conference with Walter Newman re sale of generator and delivery	0.20	80.00	CMG
	Review memos to/from Kelly MacNealy re interest in purchasing assets	0.20	80.00	CMG
	Review numerous memos to/from vehicle purchaser re vehicle purchases and inspections	0.55	220.00	CMG
	Review Intuit agreement, memos to/from Frank White re payment medium	0.25	100.00	CMG
	Review memos to/from Candice Ramage, Walter Newman re resetting of hearings	0.25	100.00	CMG
	Review reset hearings re motions to enforce stay	0.20	80.00	CMG
Jul-20-22	Telephone conference with Kim Strong re case status	0.20	80.00	CMG
	Receipt and review of Order Resetting Hearing re Motion to Enforce Stay Against Doug Rogers; calendar hearing date to trigger preparation of hearing folder	0.10	20.00	KLC
	Receipt and review of Order Resetting Hearing re Motion to Enforce Stay Against Intuit Inc.; calendar hearing date to trigger preparation of hearing folder	0.10	20.00	KLC
Jul-27-22	Review and revision of itemizations	1.00	400.00	CMG
	Dictation of plan draft	1.85	740.00	CMG
	Dictation of application for compensation, notice and COS	1.25	500.00	CMG
	Assist CMG drafting and revising Bills of Sale for the 2015 Toyota Forklift and 2021 FACR cargo trailer	0.40	80.00	KLC
	Assist CMG drafting Rule 9019 Motion to Settle with Intuit	0.30	60.00	KLC
	Assist CMG drafting and revising SubV Plan, Certificate of Service re same and Ballot form	0.90	180.00	KLC
	Assist CMG drafting letter to Les Battles re bills of sale	0.10	20.00	KLC

Invoice #: 347671

Page 20

July 29, 2022

Jul-28-22	Review and revision of plan	0.85	340.00	CMG
	Review and revision of fee application	0.25	100.00	CMG
	Assist CMG drafting and revising SubV Plan and preparing exhibits for same	0.70	140.00	KLC
	Assist CMG revising Rule 9019 Motion to Settle with Intuit	0.10	20.00	KLC
	Assist CMG reviewing and revising itemizations	0.10	20.00	KLC
Jul-29-22	Assist CMG drafting and revising CMG's 1st Fee Application, Notice, Certificate of Service and Order re same	0.55	110.00	KLC
	Assist CMG reviewing and revising itemizations	0.55	110.00	KLC
	Assist CMG drafting Notice and Certificate of Service re Rule 9019 Motion to Settle with Intuit	0.10	20.00	KLC
	Assist CMG drafting Certificate of Service re SubV Plan, Ballot	0.10	20.00	KLC
	Receipt and review of Order Fixing Time re SubV Plan; calendar various deadlines and hearing date to trigger preparation of hearing folder	0.20	40.00	KLC
	Receipt and review of Clerk's letter re service of SubV Plan; calendar deadline to file ballot summary	0.10	20.00	KLC
	Totals	100.90	\$33,970.00	

DISBURSEMENTS

May-09-22	Photocopies 148 @ \$.25 re mailout	37.00
	Postage 32 @ \$.53 re mailout	16.96
May-10-22	Long Distance	3.13
May-12-22	Photocopies 378 @ \$.25 re mailout	94.50
	Postage 53 @ \$.73 re mailout	38.69
May-17-22	Photocopies 543 @ \$.25 re D. Rogers, Intuit Inc. and mailout	135.75
	Postage 2 @ \$.53 re Intuit Inc.	1.06
	Postage 1 @ \$.73 re Doug Rogers	0.73

Invoice #: 347671

Page 21

July 29, 2022

	Postage 57 @ \$1.56 re mailout	88.92
May-20-22	COURTS/USBC/MS/S	1,738.00
May-24-22	Photocopies 51 @ \$.25 re mailout	12.75
	Postage 1 @ \$.73 re Jim Fitchie	0.00
May-26-22	Long Distance	3.13
May-27-22	Parking	7.50
Jun-01-22	Photocopies 147 @ \$.25 re mailout	36.75
	Postage 20 @ \$.73 re mailout	14.60
Jun-02-22	Photocopies 14 @ \$.25 re Intuit Inc.	3.50
	Postage 2 @ \$.53 re Intuit Inc.	1.06
Jun-03-22	Photocopies 7 @ \$.25 re Richard Palmer	1.75
	Postage 1 @ \$.73 re Richard Palmer	0.73
Jun-06-22	Photocopies 206 @ \$.25 re mailout	51.50
	Postage 184 @ \$.53 re mailout	97.52
	Postage 1 @ \$.73 re R. Palmer	0.73
Jun-09-22	Long Distance	3.13
Jun-19-22	Fed Express	58.29
Jun-21-22	Parking	8.50
	Photocopies 527 @ \$.25 re mailout	131.75
	Photocopies 85 @ \$.25/page	21.25
	Postage 2 @ \$1.56 re mailout	3.12
	Postage 6 @ \$1.76 re mailout	10.56
Jul-08-22	Photocopies 144 @ \$.25 re mailout	36.00
	Postage 47 @ \$.53 re mailout	24.91
Jul-14-22	Photocopies 147 @ \$.25 re mailout	36.75
	Postage 48 @ \$.57 re mailout	27.36
	<hr/>	<hr/>
	Totals	\$2,747.88
	<hr/>	<hr/>
	Total Fee & Disbursements	\$36,717.88
	<hr/>	<hr/>
	Balance Now Due	\$36,717.88

SUMMARY BY TIMEKEEPER

TIMEKEEPER	RATE	HOURS	AMOUNT
Craig M. Geno	\$400.00	68.95	\$27,580.00
Kathryn L. Carter	\$200.00	31.95	\$6,390.00

TAX ID Number 45-4013160

Invoice #: 347671

Page 22

July 29, 2022

TRUST STATEMENT		Disbursements	Receipts
Apr-25-22	Received From: Generator Technologies dep to Trust for retainer		10,000.00
		-----	-----
	Total Trust	\$0.00	\$10,000.00
	Trust Balance		\$10,000.00